

Francine Torres
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., SW
Room 4008-So, Ag Stop 0268
Washington, DC 20250-0200

RE: Ferric Phosphate Petition

Date of Review: February 28th – March 3, 2005

We are against the Crops Committee's recommendations of not allowing synthetic Ferric Phosphate for use as a molluscicide. Ferric Phosphate occurs naturally in the soil and has no known harmful effects on other organisms. Current organically approved methods are not practical for organic farming.

Snails and slugs are very active at night and on cloudy days in our area. Crop managers in Castroville, California are having a major problem with the Slugs and Snails in the area, causing significant damage to vegetables. We operate an organic artichoke farm of 200 acres in Castroville and Watsonville, California. Slugs and snails are a major pest on our farms. Economic losses from slug/snail damage are often in excess of \$300 + per acre in a given year.

Currently there are no organically approved methods, which will effectively control slugs/snails. Allowed methods, such as copper banding, trapping, decoy plantings or diatomaceous earth are neither practical nor effective on a farm of this acreage and do not significantly reduce slug/snail damage within the field. We do not use these methods on our farms.

Organic growers need to have effective tools at their disposal. The lack of an effective organic slug and snail bait costs us money every year. Therefore, I would like to ask for the committee to ensure that ferric phosphate is approved for use as a molluscicide in organic farming. Thank you for your time and attention to this urgent matter.

Sincerely,

Lionel Handel, AA#02290, QL#30837
Roel Rodriguez, AA#3171, QL#38842
John Usher, AA#03931, QL#30061
Orlando Velazquez, AA#03716, QL#31207
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